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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JEREMY LAPACHET,

Plaintiff,

vs.

CALIFORNIA FORENSIC MEDICAL

GROUP, INC., TAYLOR FITHIAN, M.D.,

LANI ANTONIO, P.A., VERONICA

BERGHORST, R.N., JESSAMAE

TRINIDAD, R.N., GRASHIKA DEVENDRA,

Psychiatric R.N., TABITHA KING, L.V.N.,

AMARDEEP TAWANA, L.V.N., JUDITH

ALEJANDRE, L.V.N. COUNTY OF

STANISLAUS, a municipal corporation,

Stanislaus County Sheriff ADAM

CHRISTIANSON, and DOES 1-50, Jointly

and Severally,

Defendants.

Case No. 3:16-cv-06959-HSG

**STIPULATION AND ORDER RE:  
BRIEFING SCHEDULE FOR  
DEFENDANTS' MOTIONS TO CHANGE  
VENUE**

**STIPULATION**

The parties, by and through their respective attorneys of record, hereby stipulate and agree as follows:

1. On February 13, 2017, County of Stanislaus filed a Motion to Change Venue, and the Court set a Motion Hearing for April 13, 2017 at 11:00 a.m.
2. On February 17, 2017 the CFMG Defendants filed a Motion to Dismiss or in the Alternative Transfer Venue, and Court set the hearing date for April 27, 2017 at 2:00 p.m.
2. On February 17, 2017, the Court reset the hearing date for County of Stanislaus' Motion to Change Venue to April 27, 2017 at 2:00 p.m.
3. The parties jointly request that the Court continue the briefing schedule as follows:
  - a) Plaintiff's Opposition due on or before April 3, 2017;
  - b) Defendants' Replies due on or before April 10, 2017.
4. Good cause exists, because Plaintiff's co-counsel, Haddad & Sherwin LLP, just appeared in this action on February 17, 2017 (Doc. 26), and Plaintiff's counsel has several other major deadlines and responsibilities in other pending cases that would make it impossible to adequately brief opposition papers to Defendants' motions by the current deadline of February 27, 2017. Further, since the hearing date for both motions already has been consolidated to April 27, 2017, there is sufficient time for the parties and court to brief and review responses and replies according to normal deadlines pegged to the new hearing date.
5. For these reasons, all parties stipulate and request that this Court enter the following order adjusting the briefing schedule for these motions.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 Dated: February 23, 2017

HADDAD & SHERWIN LLP

3 /s/ Michael J. Haddad

4 MICHAEL J. HADDAD  
5 Attorneys for Plaintiff  
6 JEREMY LAPACHET

7 Dated: February 22, 2017

BERTLING & CLAUSEN, LLP

8 /s/ Jemma Saunders\*

9 JEMMA PARKER SAUNDERS  
10 Attorneys for Defendants CFMG, Fithian, Antonio,  
11 Berghorst, Trinidad, Devendra, King, Tawana, Alejandro

12 Dated: February 22, 2017

RIVERA & ASSOCIATES

13 /s/ Jesse Manuel Rivera\*


14 JESSE MANUEL RIVERA  
15 Attorneys for Defendants County of Stanislaus, Sheriff  
16 Adam Christianson

17 \*Ms. Saunders and Mr. Rivera give their consent to file this stipulation with their  
18 electronic signatures.

**ORDER**

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED. Plaintiff's Responses in opposition to Defendants' motions to change venue are due no later than April 3, 2017, and Defendants' replies are due no later than April 10, 2017.

Dated: February 23, 2017

  
Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT